

Carbofuran

Need toxicity information - ambient toxicity data

Data is readily available - DPR's data - all acute

At this time there is no chronic testing being undertaken

If waterbody outside Delta - does it help to remove from CALFED's parameters of concern list.

CVRWQCB's basin plan - there are beneficial uses associated with Colusa Basin

Carbofuran, today, does not pose threat to Colusa Basin Drain

At this time, a case should be made for carbofuran to remain on list

Carbofuran on existing list - go through process of taking off the list

DPR data - San Joaquin detection limit exceeds 400 nanograms/l

Is carbofuran delisted as a chemical to control alfalfa weevils? No.

RWQCB did not list carbofuran as impairing the Delta - listed as stretch of Sacto River and Colusa Basin Drain - now only Colusa Basin Drain - focus should be on whether or not problem in Colusa Basin Drain

If toxic samples of carbofuran found in Delta where carbofuran - should continue to address

Need to address whether a problem that can be solved. Differing weather patterns cause appearance in sampling.

No one has ever made case - presented data that carbofuran should be listed in Delta - if data exists - should present

There are concentrations of carbofuran in Colusa Basin Drain which are higher than RWQCB criteria

Process of Listing/Delisting

If listed as a result of 303(d) list and regulatory agency has now removed - the validity of removing based upon agency's decision needs to be reviewed

Carbofuran is on list - should follow developed procedures for removing

Most recent data indicates no problem with carbofuran in Colusa Basin Drain

Flexible/continuous process - if original reason for listing no longer exists but further data is discovered - should consider further data

Sacramento Slough - 12 out of 60 exceedances

Question is whether exceedances are causing problem

Performance goal not same as a water quality objective

Flexibility with basis for listing or delisting - should always be receptive to new information

Colusa Basin Drain listed on 303(d) for carbofuran - does have beneficial uses - specifically for habitat

USFWS - concerns with carbofuran on broader scale - particularly avian impacts - do not specifically agree or disagree carbofuran on list

Carbofuran originally listed due to water samples in Sacto River, Slough, Colusa in concentrations that exceed performance goal - now only exceeding in Colusa Basin Drain

An exceedance of a criterion does not necessarily indicate an impact

Need more representative analysis of all carbofuran data.

Currently no criterion - biological effect levels could be reviewed to determine whether carbofuran a parameter of concern or potential parameter of concern.

Parameters of concern should impact bay and delta - do not see connection bay and Colusa Basin Drain

Carbofuran exceeded .5 micrograms/L

Further data could be reviewed and discussed further at a future date

Members who agree with remaining on list should also present information

Ample evidence to suggest carbofuran in waterbody and exceeds performance goal - sufficient to make decision

If 303(d) list is only basis for listing - should everything on 303(d) be included on Parameters of Concern List?

If further data requested - requestor should be informed of specific data necessary for PAT review

Data should be provided to PAT at least one week in advance - summarized

Final Recommendation

Review further data and discuss at next PAT meeting